Statement from the Commission for Regulation of Utilities (CRU)

CRU Vision - Energy Supplied Safely

Looking ahead, the CRU have four strategic priorities for the next three years. These will ensure focus on delivering in the public interest. One priority is, to 'Ensure compliance and accountability through best regulatory practice' and the RGI Scheme is a cornerstone of this priority.

There are currently approximately 3,000 members in the RGI Scheme. We acknowledge the positive contribution of RGIs to public safety and will continue to work with gas installers and the RGII to ensure that the RGI Scheme develops and remains effective.

The CRU is fully committed to the extension of the RGI scheme to include Non-Domestic Gas Installers. This is a positive development that will provide non-domestic customers with the same assurance as domestic customers that the gas works being undertaken are carried out by qualified and registered professionals.

To ensure the successful extension of the scheme the introduction of Non-Domestic Gas Works was moved to January 2021. We continue to build on the progress achieved to date with the valuable input of RGIs, industry and the RGII.

Through national advertising campaigns, we encourage customers to use a Registered Gas Installer for any gas work carried out. Results of the campaigns demonstrate awareness of the RGI scheme continues to rise year on year.

We are committed to investigating all allegations of suspected illegal gas works and to prosecuting those operating outside the RGI Scheme. Three successful gas prosecutions were undertaken in 2018 and one to date in 2019, bringing the total to 39 since 2009. We encourage RGIs to continue to report suspected illegal gas works to the CRU. We look forward to continuing to work with all RGIs and the RGII to ensure the safety of all gas works, both in homes and businesses.



Dr. Ann McGarry
Director Energy Safety and Customer Affairs, CRU.
The CRU, 'Protecting the Public Interest in Water, Energy and Energy Safety

CRU Enforcement

The Commission for Regulation of Utilities (the CRU) has over the past ten years continued to build an enforcement capability which supports the Registered Gas Installer (RGI) scheme and the industry's continuous focus on safety.

Each year several individuals and companies are brought before the courts following investigations into gas works activity and portrayal as an RGI. Approximately 80 reports are received each year alleging illegal gas works and or false portrayal as an RGI. Every report is risk assessed, investigated and a file presented to the Case Review Team (CRT) within the CRU. A number will tend to be incorrect reports i.e. commercial disputes with an RGI, and not related to gas works for example work on the wet side of a heating system.

The reports which correctly identify an offence will all be brought forward with recommendations as to the next actions which can range from information or cease and desist letters through to a prosecution for specific offences. A prosecution by the CRU is a criminal prosecution and must meet the very high threshold of beyond reasonable doubt

Recently, the CRU has carried out an enforcement review looking back over a number of years and a determination was made that the inspectors will incorporate proactive work alongside the reactive investigations.

This is borne from several factors. One, industry has judged the visibility of the CRU inspectorate as low. Secondly, the areas which appear to have a high impact from illegal activity can be better profiled as the CRU increase the data collected from reactive investigations.

Unfortunately, it is becoming evident that a significant proportion of the illegal activity detected through proactive work, such as unannounced site visits, involves an RGI signing off on or employing individuals to undertake illegal gas works.

It is essential that RGIs, the CRU and RGII take a firm stance on this behaviour. If left unchallenged this behaviour damages the RGI scheme and undermines the strong efforts of compliant installers. CRU inspectors working with RGII inspectors will be in every county over the coming months and are seeking to target illegal gas works. If you have information or a suspicion that illegal gas works are taking place you are urged to pass the information on via the RGII website here. Information can be provided anonymously if preferred.

Our goal is to ensure a safer and fairer gas industry for all RGIs and end-users. But we need your help to identify illegal activity and those within the scheme who continue to support this behaviour with the issuance of certificates.

When detected, suspected illegal gas workers will be investigated and may be prosecuted with sanctions of up to 3 years in prison and or a €15,000 fine for each offence. The CRU will be working to publicise the outcomes of our enforcement activities more widely.

RGIs found to be issuing certificates for illegal work face disciplinary action which can include being removed from the register.

As an industry we must work together to promote good practice and compliance with the law.

Keith Walsh Gas Safety Officer

REINEWS

CRU Successful Prosecutions



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RGII Reception Area

RGII have recently carried out works at our Kimmage offices in order to improve the reception facilities to RGIs. From late August RGII are happy to announce that the reception will be open for business throughout lunch time (1-2pm) for walk-in sales of certificates or other queries. This is the beginning of an overall improvement in our service to RGIs.



A word from the new Gas Safety Manager

Welcome to our 2019 Newsletter. As was communicated to us by RGIs during the roadshows in 2018, we are working to improve our communication with RGIs, this newsletter is a starting point on that journey of improvement, and we hope to publish more newsletters and communications throughout the expected period of change in the near future.

Since my appointment I have been working together with the RGII inspectors, staff and management to fully appreciate the requirements of this role. Having a strong technical background, gas engineering experience with an LPG company, project management and previous experience with implementing handheld technology, I consider these skills and experience will be put to the best use in this role.

As well as continuing to provide a safe and robust RGI scheme, those of us in the gas industry can see that there are many significant challenges to be faced over the coming months and years, specifically the introduction of the regulation of Non-Domestic gas.

RGII continue to work together with the CRU and other industry stakeholders to ensure a smooth introduction of the Non-Domestic register in January 2021. RGII and your elected IRP panel intend to keep you informed of changes and decisions as they happen.

RGII management and inspectors attended a joint meeting with the CRU safety team recently to discuss various matters, one aspect of the meeting was the issue of enforcement in relation to those found to be in breach of the regulations around certification. While this issue does not apply to the vast majority of RGIs, let me be very clear about this, if an RGI is found to be certifying work that is not completed by that RGI (unless signing of a Trainee's work or expressly using the change of installer process authorised by RGII), that person may be brought for Disciplinary Hearing and may be sanctioned, up to and including revocation of registration. I encourage any RGI that is aware of this practice to report it to RGII through your inspector or by using the online complaint form (you can do so anonymously). RGII continue to work under direction from and together with CRU on enforcement, please contact myself or any inspector if you believe illegal gas works or certification of illegal gas works is taking place, or complete the online form. It is crucial that RGIs, the CRU and RGII take a firm stance on this activity. If left unchallenged this behaviour damages the RGI scheme and undermines the strong and appreciated efforts of compliant install-

It has been a challenging but very rewarding introduction to this role and building on from the great work over the past 10 years, I'm looking forward to working together with RGIs to ensure the safety and standard of gas work continues to meet the safety requirements. I wish to sincerely thank the RGIs for their valued support and commitment to the scheme. I am excited to see the scheme continuing to evolve with input from all stake holders, using new technologies and sound proven practices to meet the highest safety standards in the gas industry.

Keith Diamond RGII Gas Safety Manager



Non-Domestic Gas Regulation

Following on from the communication sent to all RGIs on 15th March 2019, and after engagement with, and feedback from, stakeholders across the sector, the CRU decided to postpone implementation of the new regulations. This is to allow more time to ensure introduction of this important change is as smooth as possible.

The regulation of non-domestic works will now start from January 2021. From then, non-domestic gas works (natural gas and LPG) can only be carried out by a Non-Domestic Registered Gas Installer.

Please note, the new start date will not affect the Non-Domestic provisional register, which will remain voluntary until January 2021, when it will become mandatory.

The Non-Domestic Gas Safety training course will also be unaffected: installers should continue with completing the award. From January 2021, it will be a requirement for all non-domestic installers to have completed the Core Safety and Pipework module to register and legally carry out Non-Domestic gas works. The CRU and RGII strongly recommends you do not wait to complete the course until close to the commencement of the scheme as this may result in you not meeting the entry requirements in January 2021.

Installers who have signed up to the provisional register and have been asked to submit a portfolio of work to the Recognition of Prior Learning Board (RPL Board) should continue with their applications. The decision to postpone the regulation start date will not change the RPL Board's decision-making process.

Individuals who have already completed training will not be disadvantaged by the new regulation commencement date. The requirement to complete the proposed Non-Domestic Gas Assessment will not apply until five years after the new start e.g. 2026.

RGII continue to work with CRU and key industry stakeholders to design and implement a scheme that will work well for all parties involved. The focus of this work will be;

- Drafting Statutory instrument for Non-Domestic Gas Works
- Assist CRU with the necessary update of Criteria Document to cover Non-Domestic Gas Installers
- Continue secretariat of the RPL Board
- Design certificates that are safety focused and fit for use in the Non
 -Domestic gas industry
- Develop an Inspection & Audit procedure for Non-Domestic gas installations
- Engage with the Non-Domestic Gas Installer group through communications, roadshows and public events to ensure the smooth implementation and operation of the Non-Domestic Gas Installer registration
- Engage with PAPA group and wider industry stakeholders to ensure the public interest is best served by implementing the Non-Domestic Gas Installer registration and that the public are aware of the changes

Certification – Reminder

- As per Irish legislation, the CRU Criteria Document and IS 813, a
 Declaration of Conformance (DOC) shall be given to the person
 responsible for the premises and/or the operation of the installation and a copy to the gas supplier if requested to do so.
- This is a requirement for all gas works carried out by an RGI
- Operational Procedure No. 1 of the Criteria Document sets out the procedure for issuing certificates by RGIs
- Green copy DOCs shall be returned to RGII offices within 20 days of issue
- An RGI is only permitted to certify his or her own work

Declarations of Conformance

Certificates are available from RGII. To facilitate the wide range of "Gas Works" undertaken by R.G.I.'s there are three different types of Declaration of Conformance Certificate visit www.rgii.ie for more information and price list.

Certificate Returns

You must return the green copy of the Declaration of Conformance to RGII Unit 9, KCR Industrial Estate, Kimmage, Dublin 12. Within 20 days of issue of the certificate

Technical Bulletin—CO risk from incorrectly converted appliances

Click here for the August 2019 Technical Bulletin

RGII has become aware of several occurrences where appliances have been found to be on a Liquefied Petroleum Gas (LPG) supply but have been put into service set up for Natural Gas. RGIs are reminded to;

- Isolate appliances if found to be dangerous, or producing high levels of CO
- Always follow manufacturers instructions during installation, service and repair
- Contact your local RGII inspector if unsure

RGIs are reminded to be vigilant when servicing and installing appliances and to watch out for the following warning signs;

- High levels of CO in boiler Flue Gas Analysis readings
- Heavy staining soot deposits or discolouration around the appliance
- Blackening and/or soot deposits on kitchen equipment (pots, pans etc)
- Bad (orange or yellow) flame picture (see photos in bulletin)
- Flame lifting on cookers/hobs
- Excessive condensation
- Incorrect family gas on data badge of appliance



NSAI News - IS 820:2019 Non-Domestic Gas Installations (Edition 3)

An important new revision has been made to I.S. 820, the standard for Nondomestic gas installations. The standard is aimed at commercial gas installers and specifies requirements for the design, operation, maintenance and testing of natural gas and LPG installations, to the point of delivery of the gas to appliance(s) in non-domestic premises.

Under CRU regulations it will be a legal requirement that non-domestic gas works (natural gas and LPG) be carried out by a Registered Gas Installer from January 2021.

NSAI's Director of Standards and Metrology, Enda McDonnell says;

"I.S. 820 has been specifically revised to ensure current good practice is reflected in the new edition, supporting the implementation of the extended RGI scheme".

The main changes to the standard include additional and revised guidance/requirements for:

- outdoor catering and mobile catering and display units;
- external and internal buried pipework;
- strength and soundness testing;
- over pressure protection and regulator systems on LPG cylinder installations;
- safety inspections of existing installations.

Background

Edition 2 of this standard was published in 2010.

Since then, the Commission for the Regulation of Utilities (CRU) has advised that the current Registered Gas Installer (RGI) regulatory model, which governs the work of RGIs in the domestic sphere, will be extended to those works on Natural Gas and LPG fittings designed for Non-Domestic gas works. This will make it a legal requirement from January 2021, under CRU regulations, for Non-Domestic Gas Works to be carried out by a Registered Gas Installer only. The RGII are operating a Non-Domestic RGI Provisional Register, which will remain voluntary until January 2021, when it will become mandatory.

In supporting this, I.S. 820 has been revised by the subcommittee, TC2 "Installations and Appliances" of the Gas Technical Standards Committee to reflect the new provisions.

Also, included in the new provisions, are the requirements for LPG outdoor catering.

Gas related Standards under review

GTSC are currently revising the following Irish standards:

- I.S. 3213 Code of practice for the storage of LPG cylinders and cartridges
- I.S. 328 Gas transmission pipelines and pipeline installations

Have your say on standards

RGIs are encouraged to submit their comments on gas standards when they are sent for public comment, to do this, <u>please join the NSAI 'Your Standards</u>, Your Say' here.

Standard SR 50 out for public comment

RGIs who also work in plumbing are encouraged to submit their comments on SR 50, to do this, please join the <u>NSAI 'Your Standards, Your Say' here</u> and click <u>here</u> for the two parts of SR 50 out for public comment.

RGII website update

The current RGII website has been in use since the inception of the RGI scheme. It is well outdated and requires an update to modern standards with mobile and other device accessible pages and other modern functionality. We are currently planning on updating the website to include a number of new features;

- 1. Log-in for our registered installers where they can view technical or safety material and other news/updates, after log in have the following ability;
 - a. Easier user experience when using the website
 - b. Contact page/form for technical queries to our inspectors
 - c. Contact page/form for other regulatory queries to Installer Representative Panel
 - d. Allow payments for annual subscriptions via the website
 - e. Allow payments for certificate orders via the website
- 2. The website is not currently mobile-enabled, we want it to be accessible for all types of hardware (PC, tablet, mobile)
- 3. Currently the site is functioning for gas users to find registered gas installers, there is also a lot of good information on the website for gas users, which we intend to improve upon

We hope that these improvements will assist RGIs in their daily interactions with RGII.



Disciplinary cases

RGII continue to use the Disciplinary Process function of the Gas Safety Supervisory Body where necessary to address issues found with RGIs in the scheme. This is generally used where serious safety issues or breaches of the Rules of Registration or Criteria Document have been found.

RGII have completed Disciplinary Hearings and several sanctions applied to various situations;

- a. Many RGIs have been issued oral and written warnings for installations certified by them that do not meet current standards, RGIs were also given higher inspection monitoring sanctions at their cost.
- b. An RGI company and two RGIs that were found to be certifying illegal gas work were suspended for one month and the company had several further inspections at their cost applied to them for this breach of the Rules of Registration and Operational Procedure no. 1.
- c. An RGI found to be certifying illegal gas work was suspended for one month and was subject to further inspection at his cost for this breach of the Rules of Registration and Operational Procedure no. 1
- d. An RGI where an installation was involved in a house fire was suspended until further training was completed
- e. An RGI who left a dangerous installation with open ended gas pipework was suspended and ultimately registration was revoked following a disciplinary hearing

For the avoidance of doubt, an RGI may be liable to disciplinary action(s) in accordance with Section D of the Criteria Document in any of the following circumstances;

- Furnishing incorrect, misleading or fraudulent information or documentation in an Application for Registration to the Body or at any subsequent renewal application.
- ii. Any material breach of the Rules of Registration or any material breach of this Criteria Document, including, but not limited to, the following:
 - a. any failure to carry out work in compliance with the requirements of the Criteria Document and specifically the industry standards set out therein
 - any failure to respond adequately to or at all to correspondence or other communications from RGII, the Commission, an Inspector, a Complaints Officer or from any Disciplinary Body, or failure to cooperate fully with any inquiry or investigation being conducted by or on behalf of RGII
 - providing a Completion Certificate in respect of Gas Work that has not been completed by the RGI (except in circumstances so permitted by the Body)
 - d. failure to meet the Inspection Performance Criteria (as approved by the Commission and as per the arrangements pursuant to Section B 3.4); and
 - e. failure to provide work for inspection in line with the requirements of the Criteria Document and RGII's Audit and Inspection Procedure

Gas Networks Ireland update



Reported Gas Escapes. 1850 20 50 50 RGI Direct 1850 211 540 Customer Service 1850 200 694

Safety Advice

- Gas Networks Ireland are advising all RGI's to be very cautious with the
 removing and replacing of the test point on the meter. The over tightening will cause the test point to break. The test point requires a slight
 tighten beyond hand tight and then tested with leak detection spray.
- RGI'S must ensure the disk is removed from the meter prior to carrying out a soundness test to be sure the test was carried out correctly where the meter has been safety locked by Gas Networks Ireland.
- If the meter is removed as part of Gas works being carried out it is the responsibility of the RGI to replace the meter washers, refit the meter correctly in the box and located in the shelf.
- All damaged meter boxes or cabinets must be reported to Gas Networks Ireland.

Gas Pressure

When reporting any issue with Gas pressure please include the following information.

- 1. Standing pressure at the meter test point.
- 2. Working pressure at the meter test point (when the appliance/s are turned on)
- 3. Working pressure at the appliance.

General

- The removal of any labels and or notifications is not permitted from meter cabinets or boxes.
- The return of certificates when gas is introduced/restored is essential.

REINEWS

Restoring Gas Supply following meter lock

It is important to be aware that there are 2 reasons for a Locked gas meter – either Safety or Account related

When GNI lock a meter, we attach a notification to the meter to show if it has been locked for Safety reasons (Triangle shape) or Account related reasons (examples below)

An RGI can only restore gas where a meter has been locked for Safety Reasons – Notification to GNI when gas is restored is essential.

- a. This can be done by ringing us on a dedicated phone line for RGIs (1850 211 540) or by emailing a picture of the completed conformance cert to GasOn@gasnetworks.ie
- b. Once we receive the notification, we update our system to show that gas has been restored; failure to notify can lead to the property appearing on illegal consumption reports, and if the customer cannot locate and provide a copy of your cert when we visit they may be re-locked through no fault of their own

RGI'S ARE NOT PERMITTED TO INTRODUCE GAS TO METERS THAT ARE LOCKED FOR ACCOUNT REASONS (e.g. SHIPPER INSTRUCTION AND/OR CUSTOMER LOCK).

If a meter is locked for account reasons there is no longer an active customer on the system account and restoring gas will lead to the property consuming gas and not being billed – the property will appear on GNIs illegal consumption list and could end up being disconnected

If there is no notice attached to the locked meter, or you are unclear whether the lock is for Safety or Account reason, please phone GNI on 1850 211 540 and we will provide you with this information

NOTE

Where the following notices are attached to the meter Registered Gas Installers <u>are permitted</u> to restore gas to the installation and issue Declaration of Conformance.



NOTE

Where the following notices are attached to the meter Registered Gas Installers <u>are not permitted</u> to restore gas unless authorised to do so. If the Registered Gas Installer is unsure as to the account status at the premises, please contact our

call centre 1850 211 540







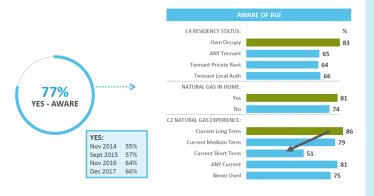
RGI TV advert campaign insights

Following on from the RGI TV advertisement campaigns ran by Gas Networks Ireland as part of the PAPA strategy group chaired by the CRU, RGII can publish the following insights;

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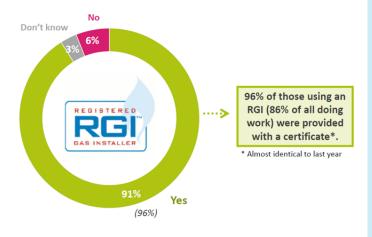
Knowledge of RGIs

Three quarters of adults are aware of the Register of Gas Installers (RGI). This is higher than last year. (Base 1,006 Adults surveyed - Q.4 Have you heard of the Register of Gas Installers also known as RGI?)



Use of an RGI to carry out gas work

The vast majority of those who had work done did so using a Registered Gas Installer (but perhaps a little lower than 2018). (Based on all who undertook gas works in past 12 months – 153)



() = 2017 in brackets

IF YES: Q.5b Did you use a RGI (Registered Gas Installer) for this work?

IF RGI USED: Q.5c And were you provided with a Certificate for this work?

Summary of findings

- The RGI gas campaign is strengthening.
- One in seven adults have had gas work undertaken over past 12 months.

 This proportion rises to a quarter within Dublin.
- The vast majority of those who had work done did so with a Registered Gas Installer and nearly although slightly less than last year (91% down from 96%) were provided with a certificate for this work.
- 77% of adults are aware of the Register of Gas Installers (RGI) (up from 64%)
- Spontaneous awareness levels, 64% of all adults recall RGI TV advertising, up from 58% in 2017.
- Diagnostically the TV ad is particularly strong especially in terms of quality especially around production values and staying power having scores well ahead of the norms in these areas.
- Almost 1 in 2 gas users who saw the ad took some positive action in the last year. e.g. told someone to use RGI, looked up the internet, booked an appliance service etc.

The Future of Natural Gas

Gas Networks Ireland is part of the Ervia group. We build, operate and maintain the natural gas network in Ireland and connect all customers to the network. We ensure that over 670,000 domestic customers and 30,000 commercial customers receive a safe, efficient and secure supply of natural gas, 24 hours a day, 365 days a year.

Every new house built in Ireland must meet specific building standards set out by the Department of Housing, Planning and Local Government (DHPLG). Technical Guidance Document L – Conservation of Fuel and Energy is one such building standard which must be met and sets out the minimum requirements for the building elements including levels of insulation, window details, thermal bridging, ventilation and the heating system as well as renewable energy requirements. The domestic version of this document, Part L – Dwellings, was updated this year and recently published. It is commonly referred to as NZEB (Nearly Zero Energy Buildings). The updated standards define NZEB as requiring a building to have a very high energy performance which means that nearly zero or a very low amount of energy is required in the building and should be covered to a very significant extent by energy generated from renewable sources produced on-site or nearby.

Combining a new natural gas boiler with required levels of insulation and renewable technologies such as Photovoltaic (PV) Panels will ensure a newly built house meets the latest building regulations. By replacing an old oil boiler with a new gas boiler, homeowners can improve their house's Building Energy Rating (BER) and reduce their overall energy bill. What's more, natural gas is the cleanest conventional fuel and emits 23% less CO2 than oil, so it's better for the environment, too.

Looking to the future, Gas Networks Ireland plans to have 20% of the gas network running on renewable gas by 2030, giving homeowners the ability to further reduce their home's carbon footprint.



First step in decarbonising Ireland's gas network

Gas Networks Ireland has confirmed that locally produced renewable gas has been successfully injected into Ireland's gas network for the first time. The renewable gas enters the network at Ireland's only purpose built injection facility in Cush Co. Kildare and represents the first step in Gas Networks Ireland's plan to roll out a network of renewable gas injection facilities across the country.

Renewable gas, often referred to as biomethane, is a clean, renewable and carbon neutral fuel. Its potential as a renewable fuel for heat, electricity and transport is well-recognised in response to the EU's commitment to becoming a highly energy-efficient, low carbon economy. It can replace heavily polluting fossil fuels such as coal, oil and peat and is a direct substitute for natural gas, without the need to invest in alternative infrastructure.



The planning application for a second gas injection facility, in Mitchelstown, Co. Cork, has been submitted to Cork County Council. This large-scale central grid injection facility is part of Gas Networks Ireland's GRAZE (Green Renewable Agricultural & Zero Emissions) gas project. The project is valued at €28 million, with €8.5 million in grant funding support from the Department of Communications, Climate Action and Environment's Climate Action Fund.

The Mitchelstown facility will have the capacity to support up to 20 farm-based agri-anaerobic digestion biomethane plants within a 50 km radius. Once operational, renewable gas will be sourced from local farms and will provide enough energy to heat 54,000 homes.

Managing Director of Gas Networks Ireland, Denis O'Sullivan says, "Ireland's challenge is to de-carbonise in the most efficient way possible. Renewable gas is a key pillar in our plan to fully decarbonise the gas network by 2050 through a combination of renewable gas, carbon capture and storage (CCS) and hydrogen."

"We envisage that renewable gas will contribute 20% of the total gas demand by 2030 equating to 11.5 TWh of renewable gas, sufficient to decarbonise the heating needs of one million homes."

The recently published Climate Action Plan outlines the government's commitment to set a target for renewable gas on the network by 2030 before the end of the year and to investigate the supports required to fund meeting this target. The Plan also calls for an increase in the number of Compressed Natural Gas (CNG) refuelling stations which will utilise renewable gas to provide a carbon neutral fuel to the transport sector.